

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

MICHELLE STATHAM,
Plaintiffs

vs.

PALISADES COLLECTION, LLC,
Defendant

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CIVIL ACTION NO. 4:10-CV-212

**PLAINTIFF’S MOTION FOR LEAVE OF COURT TO WAIVE
REQUIREMENT OF LOCAL COUNSEL**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE FOR THE
NORTHERN DISTRICT OF TEXAS:

COMES NOW, Michelle Statham, (hereinafter referred to as “Plaintiff”),
plaintiff in the above-referenced matter, and hereby files her Motion for Leave of
Court to Waive the Requirement of Local Counsel, and in support thereof,
respectfully shows the court as follows:

1. Plaintiff originally filed her suit in Tarrant County District Court.
Defendant removed the case to Federal Court.
2. This case is a “fee-shifting” case where Defendant is responsible for
payment of Plaintiff’s attorneys fees. Plaintiff’s objective is to
minimize attorney’s fees to the best of our ability.
3. To include another attorney as local counsel would raise the expense
of the case.

4. The undersigned attorney will be present at any and all hearings before the court.
5. The court's action of waiving the requirement of local counsel would not in any way prejudice Plaintiff or Defendant, nor would it delay any hearings or trial setting in this case.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that the Court grant this Motion allowing it Leave of Court to waive the requirement of local counsel.

Respectfully submitted,

By: /s/ Susan Landgraf
SUSAN LANDGRAF
Texas State Bar # 00784702
Attorney in Charge for Plaintiff

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CERTIFICATE OF SERVICE

I certify that on April 9, 2010, I filed the foregoing document with the clerk of the U.S. District Court, Northern District of Texas, Fort Worth Division, using the electronic case filing system of the court.

s/Susan Landgraf
Susan Landgraf